

# **EXHIBIT B**

**From:** Buie, Alan (USATXW) <[Alan.Buie@usdoj.gov](mailto:Alan.Buie@usdoj.gov)>

**Date:** Friday, Jan 26, 2024 at 7:33 PM

**To:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>

**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>, Looby, Patrick <[PLooby@wc.com](mailto:PLooby@wc.com)>, Buie, Alan (USATXW) <[Alan.Buie@usdoj.gov](mailto:Alan.Buie@usdoj.gov)>

**Subject:** RE: follow up correspondence

Jerry, thanks for your letter. I flew back into Austin last night and then spent most of today in a meeting on another matter, or I would have provided a detailed response to your letter sooner.

Also, thanks for dropping off the 64GB USB drive today. Before I left town earlier in the week, I had prepared a discovery production for our staff to load up while I was gone if we received your drive ("the January 22 Production"), and that production includes some of the items listed in your letter. So I'm attaching here a draft of the transmittal letter that I prepared for the January 22 Production, describing what it contains. (A final, signed copy of the letter will go out with the production.) I'm hoping it will be loaded and ready to go out Monday 29 January, but that's hard to predict.

Concerning the specific items in your letter: below in the left-hand column are the bullet-point items from your letter; in the middle column **in blue** are my comments regarding the status of the items; and in the right-hand column **in green** are any questions that I need your input on before I can move forward with production of the items.

Item from Morris Letter	Status	Questions for Morris
The Access database containing information derived from bank statements for more than 700 bank accounts	This Access database is part of the January 22 Production that we plan to load Monday. (FYI, 700 is a very rough number of bank accounts that I heard from the lead case agent at one point, not a number that the accountants have given me. You will receive an inventory that lists the accounts.)	None
The raw bank statements from the more than 700 accounts that were used to populate the Access database	Over the weekend or early next week, I will collect all of the bank records in preparation for delivering them. Until I do that, I won't know whether they will fit on the USB drive that you dropped off today, or how long loading them will take. So I don't yet know whether I will delay delivering the January 22 Production until I can send the	None

	bank records out at the same time on the same USB drive.	
The documents the government currently has in Relativity format, which includes somewhere between 4 and 4.5 million documents	Monday, <b>or as soon thereafter as I get your input</b> , I will ask our lit support people to place a work order with LTSC for production of these files.	Unless you and your colleagues prefer a different approach, I will ask for LTSC to produce only the files that they did not include in the previous production, which you already have. The processing time for that effort will be less than if we were to include the files that LTSC delivered previously. If you prefer that we request a production that includes what LTSC already produced, we can ask, but they may resist repeating that effort. <b>Please let me know your preference.</b>
A copy (from the taint team) of the Western Digital My Passport UltraStorage Device, serial number WX1 1A56A2KP2, which was the subject of the May 23, 2019 search warrant	I will find out Monday how much data this device contained, and let you know what size drive we will need from you for the copy. Once I get your drive, I can send it to San Antonio and ask them to send it back to you with the files; so you won't need to contact anyone in the Filter Team about this.	None
Any remaining grand jury transcripts, including the indictment presentation	This is part of the January 22 Production that we plan to load Monday.	None
Documentation regarding the FBI's human source	I spoke to the case agent about this, and I can share some general observations, but need to discuss with you.	I need to discuss this with you before taking any further steps. It won't be a long discussion, so perhaps we can knock it out when Dan and I talk to you about schedule.

Any remaining 302s, notes, or other witness materials	This is part of the January 22 Production that we plan to load Monday.	None
---	--	------

I hope the foregoing is at least reasonably clear. Please don't hesitate to call me if any of it requires explanation. Thanks.

**Alan M. Buie**  
**512.417.2901**

**From:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Sent:** Wednesday, January 24, 2024 11:28 AM  
**To:** Buie, Alan (USATXW) <[ABuie@usa.doj.gov](mailto:ABuie@usa.doj.gov)>  
**Subject:** [EXTERNAL] follow up correspondence

Alan:

Attached is correspondence following up on our call last week. Do you have time for a call this afternoon or tomorrow?

EGM



**United States Department of Justice**

United States Attorney's Office

Western District of Texas

ALAN M. BUIE  
ASSISTANT UNITED STATES ATTORNEY

903 San Jacinto Blvd., Suite 334  
Austin, Texas 78701

Phone: (512) 370-1242  
alan.buie@usdoj.gov

January 30, 2024

Gerry Morris, Esquire  
The Law Office of E.G. Morris  
505 West 12th Street, Suite 206  
Austin, Texas 78701

**Re: Discovery Production 5 in *United States v. Natin Paul*, No. A-23-CR-100-DAE**

Dear Mr. Morris:

Our staff have loaded onto your device the following additional discovery:

1. *FBI email messages dated 2014 through June 8, 2023.* I reviewed a large collection of email messages from FBI, and I have attempted to provide you with copies of any messages that contain commentary on the facts or evidence. Text redacted from the messages is chiefly (a) related only to the Public Integrity Section investigation; or (b) work product of the government's attorneys.
2. *Files from the Texas State Securities Board ("TSSB").* One of our investigators was employed by TSSB and had a small file at his TSSB office, separate from the FBI file.
3. *Investor questionnaire responses.* In 2020, FBI sent a questionnaire to a list of known World Class investors, and a folder is included here for each one that responded. Some did not complete the questionnaire and only sent records or email messages.
4. *AUSA interview binders (two folders).* One folder contains documents that I collected for interviews related to World Class Holding Company, LLC's Series A Preferred offering, which is not the subject of any of the pending charges. The other folder contains documents I collected that are pertinent to limited partnership investments.
5. *Grand Jury presentations (two folders).* These folders include transcripts, exhibits, and slide decks from the presentation of the indictment and the superseding indictment.
6. *Arrest audio and video.* The FBI Special Agents who arrested the defendant on June 8, 2023 wore audio and/or video recording equipment.
7. *Harwood interview.* This is the most recent interview of accountant Elizabeth Harwood.
8. *FBI EC and Interview Notes.* This folder collects agent interview notes that may not have been included in earlier discovery.

**Gerry Morris, Esquire**  
**January 30, 2024**  
**Page 2 of 2**

9. *Materials from FBI Forensic Accountants (two folders)*. The Access database of bank records is in the Susan Ball folder.

If you have any questions, please call me at 512.417.2901. If you or your co-counsel would like a more thorough description of the materials listed above, I suggest we schedule a time to look at the material together and discuss it, either in person or via WebEx.

Sincerely,

Alan M. Buie  
Assistant United States Attorney

cc: Simon Latcovich, Esquire (slatcovich@wc.com)  
Patrick Looby, Esquire (plooby@wc.com)